

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ARTHUR DOE, *et al.*,

Plaintiffs,

v.

**JIM HOOD, Attorney General of the
State of Mississippi, *et al.*,**

Defendants.

Case No. 3:16-cv-00789-CWR-FKB

JOINT MOTION FOR ENTRY OF PROPOSED PROTECTIVE ORDER

Pursuant to the Court's order of June 2, 2017 (ECF No. 43), the parties in this action jointly move this Court to enter a protective order permitting

- (1) Plaintiffs to proceed in this action under pseudonyms; and
- (2) Plaintiffs to conventionally file, under restricted access, full and complete copies of the documents currently on file in redacted form as ECF Nos. 17 and 17-1 through 17-5.

The parties' proposed protective order is attached as Exhibit 1.

Respectfully submitted this 18th day of August, 2017.

McDUFF & BYRD

By: /s/ Robert B. McDuff
Robert B. McDuff
Bar No. 2532
Jacob W. Howard
Bar No. 103256
767 North Congress Street
Jackson, Mississippi 39202
Tel:(601) 969-0802
Fax: (601) 969-0804
rbm@mcdufflaw.com
jake@mcdufflaw.com
Counsel for Plaintiffs

CENTER FOR CONSTITUTIONAL RIGHTS

By: /s/ Ghita Schwarz

Ghita Schwarz
pro hac vice
666 Broadway, 7th Floor
New York, NY 10012
Tel: (212) 614-6445
Fax: (212) 614-6499
gschwarz@ccrjustice.org
Counsel for Plaintiffs

LAW OFFICE OF MATTHEW STRUGAR

By: /s/ Matthew Strugar
Matthew Strugar
pro hac vice
2108 Cove Avenue
Los Angeles, CA 90039
Tel: (323) 739-2701
matthewstrugar@gmail.com
Counsel for Plaintiffs

STATE OF MISSISSIPPI
OFFICE OF THE ATTORNEY GENERAL

By: /s/ Paul Barnes

Paul Barnes
Bar No. 99107
Wilson Minor
Bar No. 102663
P.O. Box 220
Jackson, Mississippi 39205
Tel:(601) 359-4072
Fax: (601) 359-2003
pbarn@ago.state.ms.us
wmino@ago.state.ms.us
Counsel for Defendants

CERTIFICATE OF SERVICE

This is to certify that on this day I, Ghita Schwarz, Counsel for Plaintiffs, electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notice of such filing to the following:

PAUL E. BARNES, MSB No. 99107
Special Assistant Attorney General
State of Mississippi
Office of the Attorney General
Post Office Box 220
Jackson, MS 39205
pbarn@ago.state.ms.us

WILSON MINOR, MSB No. 102663
Special Assistant Attorney General
State of Mississippi
Office of the Attorney General
Post Office Box 220
Jackson, MS 39205
wmينو@ago.state.ms.us

ATTORNEYS FOR DEFENDANTS

THIS, the 18th day of August, 2017.

/s/Ghita Schwarz
GHITA SCHWARZ